

# EXHIBIT C

**To: [Class Member Email Address]**  
**From: Stark v. Patreon Settlement Administrator**  
**Subject: Stark v. Patreon Settlement**

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**If you had a Patreon account and accessed videos on Patreon.com while you had a Facebook account, you may be eligible for payment from a class action settlement**

You may be a Settlement Class Member			
Unique ID:	<<Unique_ID>>	PIN:	<<PIN>>

Dear <<Name>> or if no name Class Member:

A Settlement has been reached with Patreon, Inc. (“Patreon”) in a class action lawsuit alleging that Patreon violated the Video Privacy Protection Act (“VPPA”) by disclosing its subscribers’ identities and video-viewing preferences without lawful consent. The lawsuit contends that Patreon transmitted this information to Meta Platforms, Inc. (“Meta”)—the owner of Facebook—through use of a web tracking tool called the Meta Pixel.

Patreon denies all of the allegations made in the lawsuit, denies that it violated the VPPA, and denies that Patreon did anything improper or unlawful. The proposed Settlement is not an admission of guilt or wrongdoing of any kind by Patreon. The United States District Court for the Northern District of California approved this notice.

**Why am I receiving this notice?**

You might be a Settlement Class member. Patreon’s records indicate that you had a Patreon account between April 2016 and [PRELIMINARY APPROVAL DATE] and accessed video content on Patreon.com. To be eligible for payment, you must demonstrate that you also had a Facebook account when you accessed video content on Patreon.com.

**You can submit a claim to be paid from the Settlement using the claim form available [here](#).**

**For more information and to review the full notice, please visit [www.\\_\\_\\_\\_\\_com](#).**

**What does the Settlement provide?**

Patreon will pay \$7,250,000 into a Settlement Fund. Patreon has also agreed not to operate the Meta Pixel on any web page on the Patreon website that includes video content unless: (a) the VPPA is amended in relevant part, repealed, or otherwise invalidated; (b) Patreon obtains consent in the form required by the VPPA; or (c) the Meta Pixel on the relevant Patreon web page otherwise complies with the VPPA. For a full copy of the Settlement Agreement, including all other

Settlement terms, please visit [www.\\_\\_\\_\\_\\_com](http://www._____com). For more information about how distributions will be made to Settlement Class Members, please visit [www.\\_\\_\\_\\_\\_com](http://www._____com).

### **What are the expected payments?**

After deduction of the costs of notice and settlement administration, any Court-approved award of attorneys' fees (up to 30% of the Settlement Fund), litigation costs, and any service awards for the Class Representatives (up to \$7,500 to each of the six individual Class Representatives), the Settlement Fund will be distributed *pro rata* to eligible class members. We will not know the final amount that each class member will receive until all claims are evaluated. Based on claims rates in similar cases, eligible class members might receive between \$35 and \$175 each. The actual amount that each class member receives will be determined once all claims are evaluated, and may be higher or lower than these estimates. Please be patient.

### **How can I get a payment?**

If you are a class member and you want to receive a payment, you can make a claim by filling out and submitting the claim form available at [www.\\_\\_\\_\\_\\_com](http://www._____com).

You must provide the link for your Facebook profile page on the claim form, so that the Claims Administrator can verify that you are a Class Member. The link you provide must correspond with a Facebook profile that includes your personal information. Instructions for how you can find your Facebook profile page link are available at [www.\\_\\_\\_\\_\\_com](http://www._____com).

The Claim Form will also ask you to attest under oath that you accessed video content on Patreon.com while you had an active Facebook account.

If you have questions, you can contact the claims administrator by telephone (8XX-XXX-XXXX) or email [\\_\\_\\_\\_\\_@\\_\\_\\_\\_\\_com](mailto:_____@_____com).

### **When is the deadline to submit a claim form?**

To be eligible for payment, claim forms must be submitted no later than [DATE].

### **What are my other options?**

You can do nothing, exclude yourself or object. If you do nothing, your rights will be affected and you won't get a payment.

If you don't want to be legally bound by the Settlement, you must exclude yourself from it by [DATE]. You may opt out online at [www.\\_\\_\\_\\_\\_com](http://www._____com). Click on the "Opt Out" tab and provide the requested information. You may also opt out by calling 1-800-\_\_\_\_\_ or mailing the Opt-Out form available at \_\_\_\_\_ to the Claims Administrator at:

Simpluris Inc.  
3194-C Airport Loop Drive  
Costa Mesa, CA 92626

Unless you exclude yourself, you won't be able to sue or continue to sue Patreon for any claim regarding the subject matter of the claims in this case.

If you stay in the Settlement (i.e., don't exclude yourself), you may object to it or you or your own lawyer may appear and speak at the Final Approval Hearing—at your own cost—but you don't have to. Objections are due by [DATE].

The Final Approval Hearing will be held on [DATE], at [TIME], in Courtroom D on the 15<sup>th</sup> Floor of the San Francisco federal courthouse, located at 450 Golden Gate Avenue, San Francisco, CA 94102, or via Zoom Webinar.

More information about your options is in the detailed notice available at [www.\\_\\_\\_\\_\\_com](http://www._____com), or you may contact Class Counsel with any questions:

- **Simon S. Grille.** Telephone: (415) 981-4800; email: [patreonvppa@girardsharp.com](mailto:patreonvppa@girardsharp.com)

You may also access the docket in this case through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.cand.uscourts.gov>, or by visiting the office of the Clerk of the Court for the United States District Court for the Northern District of California at any of the Court's locations between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

PLEASE DO NOT CALL THE COURT OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.

**BY ORDER OF THE U.S. DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA**

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